

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

V.

Case No. 1:11:CR-239-23

GEOVANY MARTINEZ-VARGAS

MOTION TO CONTINUE PRETRIAL CONFERENCE

Comes now the Defendant, by and through counsel, and respectfully submits this, his motion to continue the date of the trial of this matter for the reasons enumerated below, to a date consistent with the convenience of the Court and the Court's schedule.

1.

As this Court knows, counsel was appointed in this matter on October 13, 2011, approximately two and a half weeks ago.

2.

It has taken counsel some time to acquire all the discovery in this matter, as some of it was misdirected to Las Vegas, Nevada.

3.

Further, counsel was in preparation for hearings and trial in the voluminous fraud case of State v. Jannuzzo, #092603 (Cobb County, Georgia). The hearings on the motions were held, but trial was reset.

4.

WHEREFORE, based on all of the foregoing, counsel

requests that the pretrial conference of this matter be continued to a time convenient with the Court's schedule, which will allow counsel to adequately represent Mr. Geovany Martinez-Vargas. Defendant requests that this period of time until the pretrial conference be excluded as being required in the interests of justice.

Respectfully submitted,

S/Robert Citronberg

Robert H. Citronberg
Attorney for Defendant
Georgia Bar Number 126275

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing motion was served electronically on:

Ms. Lisa Tarvin
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This 3rd day of November, 2011

s/Robert H. Citronberg

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